

**Hearing Date: December 13, 2016 at 10:00 A.M. EST**  
**Response Deadline: December 9, 2016 at 4:00 P.M. EST**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
:  
In re : Chapter 11  
:  
Gawker Media LLC, *et al.*, : Case No. 16-11700 (SMB)  
:  
Debtors. : (Jointly Administered)  
-----X

**NOTICE OF HEARING ON MOTION OF PROPOSED *AMICI CURIAE*  
SOCIETY OF PROFESSIONAL JOURNALISTS,  
REPORTERS COMMITTEE FOR FREEDOM OF THE PRESS,  
AND 19 OTHER MEDIA ORGANIZATIONS FOR LEAVE TO FILE  
MEMORANDUM OF LAW AS *AMICI CURIAE***

PLEASE TAKE NOTICE that upon the Motion of the Society of Professional Journalists, the Reporters Committee for Freedom of the Press, and 19 Other Media Organizations for Leave to File Memorandum of Law as *Amici Curiae* (“the Motion”), a hearing will be held before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, United States Bankruptcy Court, Southern District of New York, One Bowling Green, New York, New York, 10004, on December 13, 2016 at 10:00 A.M. EST, or as soon thereafter as counsel can be heard, to consider the Motion. The Motion is on file with the Clerk of the Bankruptcy Court and may be examined during normal business hours. The proposed *Amicus* Memorandum of Law, which is intended to provide perspective from members of the press on the First Amendment and policy values served by the third-party releases and injunction provisions contained in the Amended Joint Chapter 11 Plan of Liquidation, is attached to the Motion as Exhibit 1.

PLEASE TAKE FURTHER NOTICE that responses, if any, to the Motion must be in writing, shall state with particularity the reasons for the response, and shall be filed with the United States Bankruptcy Court, Southern District of New York, electronically in accordance

with General Order M-399 (which can be found, along with the User's Manual for the Electronic Case Filing System, at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court's case filing system and, by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard-copy delivered directly to Chambers), and shall be served upon Baker & Hostetler LLP, 1050 Connecticut Ave. NW, Washington, DC, 20036, Attention: Mark I. Bailen, so as to be actually received by December 9, 2016.

PLEASE TAKE FURTHER NOTICE that if no responses or objections are timely filed and served, the relief sought in the Motion may be granted and the Court may enter an appropriate order.

December 5, 2016

Respectfully submitted,

BAKER & HOSTETLER LLP

/s/ Mark I. Bailen

Bruce W. Sanford

Mark I. Bailen

Christopher J. Giaimo

Washington Square, Suite 1100

1050 Connecticut Avenue, N.W.

Washington, DC 20036-5304

[mbailen@bakerlaw.com](mailto:mbailen@bakerlaw.com)

Phone: (202) 861-1500

Fax: (202) 861-1783

*Counsel for Amici Curiae*